

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

|                        |   |                                   |
|------------------------|---|-----------------------------------|
| In re:                 | : |                                   |
| RONALD JOHN BORIS, JR. | : | Chapter 13                        |
| DANIELLE M. BORIS      | : |                                   |
|                        | : | Bankruptcy No. 5:22-bk-01370      |
| Debtors                | : |                                   |
|                        | : |                                   |
| RONALD JOHN BORIS, JR. | : | Motion to Continue and Impose the |
| DANIELLE M. BORIS      | : | Automatic Stay                    |
|                        | : |                                   |
| Movants                | : |                                   |
|                        | : |                                   |
| vs.                    | : |                                   |
|                        | : |                                   |
|                        | : |                                   |
|                        | : |                                   |
| Respondent             | : |                                   |

**DEBTORS' MOTION TO CONTINUE AND IMPOSE THE AUTOMATIC STAY  
UNDER § 362 PURSUANT TO 11 U.S.C. § 362(c)(3)(B) AND 105  
WITH RESPECT TO ALL CREDITORS**

Ronald John Boris, Jr. and Danielle M. Boris, the above Debtors, by and through their attorney, David S. Gellert, Esquire, of David S. Gellert, P.C., file this Motion to Continue and Impose the Automatic Stay as to all creditors for the following reasons:

1. The Movants are the above Debtors having filed their Chapter 13 bankruptcy proceeding on July 26, 2022.
2. The Debtors filed two (2) prior bankruptcy proceedings in the Middle District of Pennsylvania.

3. The first case was a chapter 13 proceeding filed on July 16, 2019 docketed to case number 5-19-03043. The Debtors' Third Amended Chapter 13 Plan was confirmed on August 19, 2020. This case was dismissed on April 23, 2021 as a result of the failure of the Debtors to make timely Trustee payments due to medical issues.

4. The Debtors' second case was a chapter 13 proceeding filed on April 30, 2021 and docketed to case number 5-21-00994. This case was dismissed on April 6, 2022 as a result of the Debtors' failure to make timely Trustee payments due to issues of communication with counsel as multiple amended plans were filed.

5. Since then, Debtor, Ronald John Boris, Jr., and Debtor, Danielle M. Boris, are now receiving fixed income, and Mrs. Boris is likewise employed. Debtors believe and, therefore, aver that clear lines of communication exist between the Debtors and counsel such that the Debtors believe they can successfully prosecute this bankruptcy proceeding.

6. The purpose of this bankruptcy proceeding will be to save the residence from a foreclosure sale.

7. This case has been filed in good faith under all of the circumstances referred to herein and any other matters as may be raised at the hearing on this matter.

8. The Debtors request this Court to continue and impose the automatic stay with respect to all creditors to allow the Debtors to continue to make payments to their secured creditors under the Plan or directly and proceed to attempt to confirm their Chapter 13 Plan.

WHEREFORE, the Debtors request that this Court enter its order to continue and impose the automatic stay with respect to all creditors pursuant to §§ 362 and 105 of the Bankruptcy Code and for such other and further relief as is just.

Dated: July 26, 2022

s/ David S. Gellert  
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